

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	Case No. 22-90341 (DRJ)
CORE SCIENTIFIC, INC., et al.,	§	
	§	Chapter 11
	§	
Debtors.¹	§	(Jointly Administered)

**GAYLOR ELECTRIC, INC. D/B/A GAYLOR, INC.’S NOTICE OF PERFECTION OF
MATERIALMAN’S AND MECHANIC’S LIEN PURSUANT TO 11 U.S.C. § 546(b)(2)**

Gaylor Electric, Inc. d/b/a Gaylor, Inc. (“Gaylor Electric”) hereby gives Notice of Perfection of Materialman’s and Mechanic’s Lien Pursuant to 11 U.S.C. § 546(B)(2) (the “Notice”), as follows:

1. On December 21, 2022 (the “Petition Date”), Core Scientific, Inc. (“Core Scientific”) and its affiliates (collectively, the “Debtors”), commenced cases under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas.

2. Gaylor Electric is a full-service electrical contractor. Prior to the Petition Date, pursuant to a contract with Harper Construction Company, Gaylor Electric provided certain goods and services to the Debtors at the facility located in Muskogee, Oklahoma that is more particularly described in **Exhibit 1** (the “Property”).

3. The Debtors, along with any other parties with interests in the Property, have failed and refused to pay Harper Construction Company or Gaylor Electric for the balance owing for goods and services provided.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (5526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisition, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisition I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters and service address is 210 Barton Springs Road, Suite 300, Austin, Texas 78704.

4. Accordingly, pursuant to Okla. Stat. Ann. tit. 42, § 141, *et seq.*, Gaylor Electric has recorded a Mechanics' or Materialman's Lien Statement (the "Lien") in Muskogee County, Oklahoma. A true and correct copy of the Lien is attached hereto as **Exhibit 1**.

5. Gaylor Electric is a secured creditor to the extent of said Lien in the amount of \$5,245,601.81, exclusive of accruing interest and other charges, and additional amounts which have continued and are continuing to accrue.

6. The lien is properly perfected pursuant to Okla. Stat. Ann. tit. 42, § 141, *et seq.* and all other applicable law.

7. Gaylor Electric hereby provides notice of its perfected Lien in accordance with 11 U.S.C. § 546(b) to the Debtors, their counsel, the Office of the United States Trustee, and other parties in interest.

8. To the extent required by Oklahoma law, this Notice constitutes the legal equivalent of having commenced a foreclosure or enforcement action with respect to the Lien in the proper court.

9. Gaylor Electric's interests in the Property extend in and to the proceeds, products, offspring, rents, profits, or other similar interests arising from the Property to the full extent allowable by applicable law.

10. Gaylor Electric reserves all rights with respect to the scope of its perfected Lien and its interests in (i) the Property, (ii) the machinery, materials, and supplies provided to the Debtor, (iii) the improvements to the Property, (iv) all other buildings and appurtenances on the Property, (v) the Debtors' interests in the Property, (vi) any subsequently acquired interests of the Debtors, (vii) all other property or property interests identified in the Lien, and (viii) any other property or property interests subject to the Lien as provided in Title 42 of the Oklahoma Statutes or other applicable law.

11. Gaylor Electric further provides notice that it objects and does not consent to (i) any effort to prime its perfected Lien against the Property and all other property or property interests identified in the Lien, or (ii) the use of any cash collateral subject to the Lien.

12. Gaylor Electric reserves the right to request (i) relief from the automatic stay of 11 U.S.C. § 362, or any other appropriate relief, to enforce and defend its perfected Lien against the Property or any other property or property interests of the Debtors, and (ii) seek adequate protection of the Lien and Gaylor Electric's interests in the Property or any other property or property interests of the Debtors.

13. This Notice shall not be deemed an admission that any filing is necessary to perfect or maintain perfection of the Lien under the Bankruptcy Code, the Oklahoma Statutes, or any other applicable law.

14. Gaylor Electric reserves the right to supplement or amend this Notice, including the amounts owed and to itemize any further attorneys' fees, costs, interest, or other amounts recoverable under applicable law.

15. Gaylor Electric reserves the right to request allowance and payment of administrative expense claims under 11 U.S.C. § 503.

16. Gaylor Electric files this Notice without limitation or waiver of all rights, claims, and defenses against the Debtors, their bankruptcy estates, and any third parties.

Dated: February 22, 2023

By: /s/ James B. Bailey
James B. Bailey
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Birmingham, Alabama 35203
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Counsel for Gaylor Electric, Inc. d/b/a Gaylor, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties authorized to receive electronic notice in this case.

I hereby further certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Core Scientific, Inc.
210 Barton Springs Road
Suite 300
Austin, Texas 78704

Core Scientific, Inc.
PO Box 2819
Muskogee, Oklahoma 74402

/s/ James B. Bailey

OF COUNSEL